

CALIFORNIA ENERGY COMMISSION

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December 21, 2001

Mr. Brian Walker
Reliant Energy
PO Box 286
Houston TX 77001-0266

Re: COLUSA POWER PLANT - DATA REQUESTS, ROUND 2

Dear Mr. Walker:

Information provided by Reliant Energy on December 7, 2001, pursuant to the Committee's November 30, 2001 Scheduling Order, lacked the necessary detail for staff to complete its analysis. Without the information specified in the enclosed requests, staff would conclude that it does not have adequate information to make a recommendation on the project's conformance with local, state, and federal laws, whether the project will cause an impact to public health and safety, or the environment. Therefore, pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests Reliant Energy respond to the enclosed air quality data requests.

To eliminate confusion when referencing data requests, the enclosed data requests are numbered as a continuation of the data requests submitted on August 22, 2001, and begin with Data Request #121.

Please provide written responses to the enclosed data requests on or before January 21, 2002. If you are unable to provide the information requested, need additional time to provide the information, or object to providing it, then please send a written notice to both the Committee and me within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please contact me at (916) 654-3929 or at kchew@energy.state.ca.us.

Sincerely,

Kristy Chew
Energy Facility Siting Project Manager

Enclosure – Data Requests 121-135

COLUSA POWER PLANT (01-AFC-10)
DATA REQUESTS, ROUND 2

Technical Area: Air Quality

Author: William Walters

BACKGROUND

The applicant has indicated that emission reduction credits to offset the project's NO_x and VOC emissions will be obtained by repowering the adjacent PG&E Delevan Compressor Station.

DATA REQUEST

121. Please provide documentation that PG&E has agreed to the repowering of the Delevan Compressor Station and that stipulates the amount of NO_x offsets that the applicant has the rights to as a result of the repowering.
122. Please provide an anticipated schedule for the repowering and a comparison of that schedule with the anticipated construction and operating schedule for the CPPP.
123. Based on information provided by the local air district, the repowering of the compressor station would create emission increases in VOC and PM₁₀ emissions. Please identify what is proposed to mitigate those emission increases.
124. Please provide the documentation (i.e., source tests, emission calculations) that was used to determine the quantity of the emission reductions available from the repowering of the PG&E compressor station.
125. Please provide the technical analysis that supports the interpollutant offset ratio proposed for the NO_x for VOC interpollutant offsets. This data request was initially requested under Data Request 19e, but no response was provided with the first set of Data Responses.

BACKGROUND

It is staff's understanding that the applicant now intends to use PM₁₀ ERCs created through the cessation of agricultural burning, through road paving, or from existing ERCs available from an industrial source in Glenn County. However, no agreements for any of these potential ERC sources have been provided. No schedules for the creation of the ERCs have been provided. Complete documentation to substantiate the quantity of emission reductions has not been provided. Additionally, the applicant has not provided information to justify the use of road paving as appropriate PM₁₀ mitigation for a combustion source. Staff requires additional information to assess the proposed PM₁₀ offset package.

COLUSA POWER PLANT (01-AFC-10)
DATA REQUESTS, ROUND 2

DATA REQUEST

126. Please provide a final offset package indicating exactly which of the proposed potential offset sources will be used to offset PM₁₀ emissions from the CPP.
127. Please provide documentation substantiating that the agricultural burning ERCs will be available to the CPP. Please identify the anticipated schedule of when all of these ERCs will be banked by the local air district.
128. Please revise the provided calculations regarding the agricultural burning ERCs, clearly indicating what crop is involved from each identified source.
129. Please provide written documentation regarding the applicant's ability or right to pave Lurline Road (e.g., a letter of approval from the County public works or roads department), and provide an anticipated schedule for completing the road paving.
130. Please provide an estimate of the construction emissions (hourly, monthly, and annual) that would occur during the paving of Lurline Road.
131. Please provide copies of the traffic surveys, silt content tests, and other data sources used to calculate the emission reductions that will result from the paving Lurline Road.
132. Please provide information to justify the use of road paving as appropriate PM₁₀ mitigation for a combustion source in Colusa County. This justification should include a comparison of the hourly PM₁₀ emission fluctuations from Lurline Road vs. those anticipated from the CPP.
133. Please provide additional information regarding the potential ERC source in Glenn County. This information should include the type of emission reduction and location of the emission reduction. This information can be provided under confidential cover. However, the final offset package must be made public by the time the Preliminary Staff Assessment is published.

BACKGROUND

To fully mitigate the project under CEQA, in addition to local offset requirements, the Energy Commission requires that all non-attainment pollutants and their precursors be offset at a minimum ratio of 1:1. The affected pollutants for the CPP are NO_x, VOC, PM₁₀, and SO₂ (based on the project area's non-attainment status of State PM₁₀ and ozone standards). Staff has received a number of offset source proposals from the applicant, including more recent proposals for ERC creation through road paving and interpollutant SO₂ for PM₁₀ offsets. Staff is unclear regarding the current status of all offset sources being proposed by the applicant.

COLUSA POWER PLANT (01-AFC-10)
DATA REQUESTS, ROUND 2

DATA REQUEST

134. Please provide a clear tabular listing of the emission reduction credits proposed for each pollutant requiring CEQA offset mitigation showing that the ERC proposed will meet both the local offset requirements and the Energy Commission staff position of no net emissions increase of non-attainment pollutants (NO_x, VOC, PM₁₀, and SO₂).

BACKGROUND

In order to assess the continuing air quality permitting issues under the timeframe for the assessment of this project, staff requires timely copies of all written communication between the applicant and the District.

DATA REQUEST

135. In Data Request #21, staff requested that the applicant provide all written project correspondence (including e-mails) between the District or USEPA and the applicant and as it occurs between the District or USEPA and applicant until the final commission decision for this case. It appears that the Energy Commission has not received this ongoing correspondence and therefore does not have all necessary information to assess the proposed project. Please forward and docket the requested communication, which has not otherwise been forwarded, since Data Request Response #21 was submitted in September 2001.